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Attorneys for Various Creditors

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC  
COMPANY,

Debtors.

☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors  
*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**OMNIBUS NOTICE RE SPEAKING  
ATTORNEYS PER COURT'S ORDER  
ESTABLISHING CONFIRMATION  
HEARING PROTOCOL**

Related Docket Nos.: 7182, 7233, 7236,  
7239, 7241, 7242, 7245

Duane Morris, LLP ("Duane Morris"), counsel to various creditors that have filed objections to the Debtors' proposed assumption of purported executory contracts and cure claims, as set forth below (collectively, the "Objectors" or "Objections," as applicable), submits this Notice in accordance with the Court's Order Establishing Confirmation Hearing Protocol [Doc. No. 7182], which directs, inter alia, that by May 22, 2020, "All parties that intend to participate at the Confirmation Hearing must provide the Court with the names and e-mail addresses of all speaking attorneys and witnesses."

1 The Objectors file this Notice as a protective measure, in the event that any ground for  
2 objection raised in the Objections becomes at issue during the confirmation proceedings, including,  
3 but not limited to, any objection to the Debtor's intended disallowance of proofs of claim for  
4 indemnification and contribution based upon the language in paragraph 13 of the "Schedule of  
5 Executory Contracts and Unexpired Leases to be Assumed Pursuant to the Plan and Proposed Cure  
6 Amounts" (Exhibit B to the Debtors' "Plan Supplement" [Docket No. 7037]). The Objections are as  
7 follows:

- 8 • **Arbormetrics Solutions, LLC:** Arbormetrics Solutions, LLC's Objection and  
9 Reservation of Rights Re Assumption of Purported Executory Contracts Pursuant to  
the Plan and Proposed Cure Amounts (Doc. No. 7233)
- 10 • **Asplundh Construction, LLC:** Asplundh Construction, LLC's Objection and  
11 Reservation of Rights Re Assumption of Purported Executory Contracts Pursuant to  
the Plan and Proposed Cure Amounts (Doc. No. 7236)
- 12 • **Trees, LLC:** Trees, LLC's Objection and Reservation of Rights Re Assumption of  
13 Purported Executory Contracts Pursuant to the Plan and Proposed Cure Amounts  
(Doc. No. 7239)
- 14 • **Utility Tree Service, LLC:** Utility Tree Service, LLC's Objection and Reservation  
15 of Rights Re Assumption of Purported Executory Contracts Pursuant to the Plan and  
Proposed Cure Amounts (Doc. No. 7241)
- 16 • **Western Environmental Consultants, LLC:** Western Environmental Consultants,  
17 LLC's Objection and Reservation of Rights Re Assumption of Purported Executory  
Contracts Pursuant to the Plan and Proposed Cure Amounts (Doc. No. 7242)
- 18 • **International Business Machines Corporation:** International Business Machines  
19 Corporation's Objection and Reservation of Rights to Assumption of Executory  
Contracts Pursuant to the Plan and Proposed Cure Amounts (Doc. No. 7245)

20 Ron Oliner (roliner@duanemorris.com) and Geoff Heaton (gheaton@duanemorris.com) of  
21 Duane Morris will be the "speaking attorneys" on behalf of the Objectors. The Objectors do not  
22 intend to call any witnesses in connection with the confirmation proceedings, but reserve the right to  
23 call witnesses at a later date, as necessary, in connection with any proceedings related to assumption  
24 of executory contracts and/or cure amounts.

25 Dated: May 22, 2020

**DUANE MORRIS LLP**

26 By: /s/ Aron M. Oliner (152373)

27 ARON M. OLINER

28 Attorneys for Various Creditors